

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
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6 *****

7 IN RE:
8 NATIONAL PRESCRIPTION OPIATE MDL NO. 2804
9 LITIGATION

10
11 This document relates to: Case No. 17-MD-2804

12 All cases Hon. Dan A. Polster

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15 HIGHLY CONFIDENTIAL - SUBJECT TO
16 FURTHER CONFIDENTIALITY REVIEW
17 VIDEOTAPED DEPOSITION OF:

18 STEVE REARDON

19 ALOFT BOSTON SEAPORT

20 401-403 D Street

21 Boston, Massachusetts

22 November 30, 2018 9:03 a.m.

23

24 Darlene M. Coppola

Registered Merit Reporter

Certified Realtime Reporter

1 hydrochloride limit, those numbers are changing,
2 right --

3 A. Yes.

4 Q. -- at least according to the PowerPoint,
5 correct?

6 A. Yes.

7 Q. Okay. But the fact that you have a
8 limiter that's a multiple of the average and then
9 you have customers exceeding it by 200 percent,
10 that doesn't cause you some concern as a
11 regulator --

12 MR. PYSER: Object to form.

13 BY MR. FULLER:

14 Q. -- at least, hey, why are we exceeding it
15 by 200 percent, right?

16 MR. PYSER: Object to form.

17 A. Makes sense.

18 BY MR. FULLER:

19 Q. And certainly, like you mentioned earlier,
20 you can go do some due diligence, but you would
21 want to see that due diligence documented to
22 justify why we're still shipping such an excessive
23 number to these particularly this pharmacy,
24 correct?

1 A. Correct.

2 Q. Okay. So let's go to the next one.

3 Overholt's Champion Pharmacy in Warren. I'll tell

4 you Warren is just outside of Cuyahoga and Summit

5 County. It's not in Cuyahoga and Summit County,

6 but this pharmacy -- again, we see the same

7 limiters because we're dealing with the same

8 months, and then we see the number of opium that

9 they've ordered, correct?

10 A. Yes.

11 MR. PYSER: Object to form.

12 BY MR. FULLER:

13 Q. 855, 930, 769. Then let's go to the next

14 column, which is 635 percent for the first one in

15 July. The next one is 528 percent, and then 363

16 percent, over the multiplied average.

17 Let's go to the final one. This one, New

18 Choice Pharmacy, Cuyahoga Falls. This is in

19 Summit County, okay. Again, we see the same

20 limiter amounts because we're looking at the same

21 months, 786, 1,089, 1,254. And the percentage

22 overages are 576 for the first one in July, then

23 in October we're at 635 percent, then finally 655

24 percent in December.